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VIA ECF
Judge Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Yun Hong Hua v. Eight Star Inc. et al.
SDNY #15-CV-0275 (BMC)

Dear Judge Cogan:

We represent Yun Hong Hua in the above-referenced case. This letter is in response to the Memorandum Decision and Order dated May 15, 2015 and signed by the Honorable Judge Cogan. As requested, we have recalculated the amounts owed under this decision as enclosed. We have removed our calculations for New York State liquidated damages, the $3750.00 for violation of New York Labor Law §195(1)(a) and (3), as well as our calculations for wage deductions. We hope that the court find these revised calculations reasonable.

Respectfully submitted,

/s/ Jian Hang
Jian Hang, Esq.

FOR SETTLEMENT PURPOSES ONLY
(EIGHT STAR INC.)

CALCULATIONS FOR YUN HONG HUA

***Assumptions:**	Period Worked	June 8, 2014 to December 1, 2014
	Hours worked	(5.5 x 13) = 71.5
	OT Hours Worked	31.5
	Weeks worked	25
	Weekly Salary	$495.00 ($90 x 5.5)
	NY Minimum Wage	$8.00
	NY Overtime Wage	$12.00

* Plaintiff worked either 5 or 6 days per week, so we estimated 5.5 days for calculation purposes. He worked twelve to fourteen hours per day, so we estimated 13. He was regularly paid either $80 to $100 per day so we estimated $90.00.

Unpaid Minimum and Overtime Wage

Unpaid Wages = ($8.00 x 40 + 31.5 x $12.00 - $495.00) x 25 = $5,075.00

Federal liquidated Damages = $12,450.00 x 100% = $5,075.00

Total: **$10,150**

Unpaid spread of hours pay

5 (5 days a week) x 25 (weeks) x $8.00 = $1,000.00
New York State Liquidated Damages = $1,000.00
Total: $**2,000.00**

Owed Wages
$3,100=$1,000 (deposit)+$2,100 (unpaid wages)
New York State Liquidated Damages = $3,100
Total: **$6,200**

Pre-Judgment Interest

The midpoint of when plaintiff's damages became due I choose for the calculation is March 20, 2015. See N. Y.C.P. L.R. § 5001(b). The New York statutory interest rate is 9%. N.Y.C.P.L.R. § 5004. The pre-judgment interest owed is calculated to May 21, 2015, for the convenience of the

Court.

The interest calculation is as follows:
I=d x r x n, where
I equals the pre-judgment interest due as of May 21, 2015
d equals the total amount of damages owed (exclusive of liquidated damages)
r equals the New York statutory daily interest rate of 0.09/365, and
n equals the number of days that have passed between the midpoint of when the damages because due (March 19, 2015 and May 21, 2015.

Therefore,

Interest=**$77.58**=($5,075)(Overtime back-pay)x0.09/365x62(62days from March 19, 2015 to May 21, 2015).

Total $18,427.58=$10,150+$2,000.00+$6,200+$77.58

Attorney fees: **$7,595**

Grand Total: $26,022.58